

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION,

THIS DOCUMENT RELATES TO:

Lana Dufrene

MDL NO. 2875

HON. ROBERT B. KUGLER
DISTRICT JUDGE

HON. JOEL SCHNEIDER
MAGISTRATE JUDGE

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF NELLIE DAWSON**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. will take the deposition upon oral examination of Nellie Dawson, on **July 27, 2021 at 9:30 a.m. EDT** and continuing until completion at **Marriott Raleigh Downtown, 616 S. Salisbury Street, Raleigh, NC 27601**. The court reporter will report the deposition in person and other counsel will be participating from various locations remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Victoria J. Langton
Greenberg Traurig LLP
3333 Piedmont Road NE
Suite 2500
Atlanta, GA 30305
(678) 553-7392
langtont@gtlaw.com

Date: July 26, 2021

Respectfully submitted,

s/ Victoria J. Langton

Victoria J. Langton (GA Bar No. 444119)

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*Attorney for Teva Pharmaceuticals USA, Inc.,
Teva Pharmaceutical Industries Ltd., Actavis
LLC, and Actavis Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of July, 2021, I caused a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Nellie Dawson to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants, on July 26, 2021:

Matthew Palmer Lambert, Esq. (counsel for Plaintiff Lana Dufrene)

Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)

Daniel A. Nigh, Esq. (via email)

Ruben Honik, Esq. (via email)

David Stanoch, Esq. (via email)

Conlee Whiteley, Esq. (via email)

Jessica Priselac, Esq. (via email)

Seth A. Goldberg, Esq. (via email)

Clem C. Trischler, Esq. (via email)

Sarah E. Johnston, Esq. (via email)

This 26th day of July, 2021.

s/ Victoria J. Langton

Victoria J. Langton (GA Bar No. 444119)

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